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PUBLIC ARTIFACT NUMBER ONE: Defendant Jason Goodman's YouTube video.

PLAINTIFF'S FIRST REQUEST FOR JUDICIAL NOTICE [RJN]

The below video capture was completed on Monday, July 2nd, 2018.

Relevant remarks made by Jason Goodman in YouTube video posted to the Jason Goodman channel.

<https://www.youtube.com/watch?v=h1fFYuxcoCE&t=545s>



LAWFARE: Litigation as a Weapon of Mass Destruction – with Special Guests Jared and Elizabeth Beck



Jason Goodman

Subscribe 60K

+ Add to Share ... More



5,925 views

258 32

Streamed live on Jun 21, 2018

Suing people is as popular as it's ever been, perhaps even more so. Yet it seems, legitimate suits are being bamboozled in kangaroo courts while frivolous and baseless accusations are financially ruining innocent people. Attorneys for the Plaintiffs in the DNC Fraud lawsuit, Jared and Elizabeth Beck join me to discuss this disturbing trend.

PLAINTIFF'S FIRST REQUEST FOR JUDICIAL NOTICE [RJN]

1 04:30 GOODMAN. I am very troubled by these lawsuits. People may know that another lawsuit has
2 been brought against me by ..uh... an individual who I believe is doing this for malicious purposes. Uh,
3 [laughter] that is the brother of George Webb Sweigert ... David Sweigert has brought a lawsuit against
4 me.

5 04:50 GOODMAN. He has been damaged apparently by what's been characterized as a bomb hoax at
6 the Port of Charleston.

7 05:18 GOODMAN. I certainly did not phone in a bomb hoax. The first person to use that language was
8 Robert David Steele [plaintiff in related litigation].

9 05:40 GOODMAN. It is very curious that now the brother of the individual who introduced me [George
10 Webb Sweigert] to the source that brought that information .. spent months ... George Webb I am talking
11 about now ... spent months trying to gain my trust and convince me that the information coming from
12 Marshall Richards [named as wrong-doing in present complaint] was valid and I should do a report on it.

13 06:31 GOODMAN. Now we got David Sweigert who has entered a total of seven declarations in the
14 Robert David Steele lawsuit.

15 08:37 GOODMAN. I have chosen to defend myself pro se without a lawyer.

16 08:46 GOODMAN. [Displaying PACER entry for Robert David Steele lawsuit] These notices that you
17 see here .. these are the declarations made by David George Sweigert. George Webb's brother. And in my
18 view a malicious individual who has provoked me thru a serious of basically insane videos over the course
19 of the past year.

20 08:54 GOODMAN. [Begins scrolling thru the present complaint of the lawsuit at bar for his audience].
21 Calling me out publically, accusing me of crimes, he has accused me of being paid by Mossad. Totally
22 false. He has download and re-uploaded my videos something he has lied about here in these court
23 documents .. saying he has never done that. He has also accused me now of being involved in a RICO
24 operation. And not to mention he also accuses me of starting a cult [laughter] a Scientology like cult. Of
25 doing a bomb hoax. And, um , also being involved in a Dark Net murder for hire scheme as he
26 characterizes it. Each of these allegations are totally ridiculous.

27 10:00 GOODMAN. Uh, they are being brought in my view to intimidate me to stop me from reporting
28 in the way that I do, to try to drain me financially, try to drain my time .. And, of course, ultimately what
PLAINTIFF'S FIRST REQUEST FOR JUDICIAL NOTICE [RJN]

1 Dave has made public that he wants to .. uh .. ok .. so. He, he wants to bring federal terrorism charges
2 against me – which is absolutely absurd.

3 1:03:50 GOODMAN. Of course, the flip side Jared [Beck, esq. – guest] of what your talking about
4 [Display begins of PACER docket for Robert David Steele lawsuit] is when we see a matter like Mr.
5 Sweigert [plaintiff] has done in this Robert David Steele lawsuit, where he is seemingly an uninterested
6 third party party, who has come along and filed no less than seven declarations, including accusations
7 against me – where he thinks I am involved in a murder for hire plot and he thinks I have started a cult. He
8 is trying to intimidate people.

9 1:04:21 ELIZABETH BECK. George Sweigert? Is that George Webb?

10 1:04:32 GOODMAN. David George Sweigert, George Webb's brother. Curiously. Of course, George
11 Webb was the individual who .. uh .. informed me of .. the depleted uranium on the Maersk Memphis that
12 led to that whole incident. Now David wants to try and charge me with a civil RICO case, he says he was
13 damaged by this. That there are threat vectors coming from social media. He claims I am not a journalist.
14 He claims that I have created a cartel. [Displaying complaint to audience]. And that I have done all minds
15 of things .. uh .. dirty bomb hoax.

16 1:13:50 GOODMAN. I also think there should be a mechanism in place where individuals who purposely
17 and frivolously bring these suits and a court examines them and determines them to be frivolous and a
18 waste of time these guys should face criminal penalties for misuse of the legal system.

19 1:14:33 GOODMAN. I am not interested in bringing lawsuits against these guys I just want them to go
20 away, be stuck in prison, lock the door, throw away the key and let them sit there and think about how they
21 have been abusing the legal system.

22 1:15:23 GOODMAN. I have to thank my guests, Jared and Elizabeth Beck for joining me today. We could
23 literally talk for hours. And I would love to have you guys back soon.

24 1:15:34 GOODMAN. I want to direct people to Twitter where you can follow Jared and Elizabeth.
25 [Displays Twitter page of Jared Beck @JaredBeck and "The Cranky Lawyer" @eleebeck].

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PLAINTIFF'S FIRST REQUEST FOR JUDICIAL NOTICE [RJN]

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PUBLIC ARTIFACT NUMBER TWO: Court docket in related litigation

PLAINTIFF'S FIRST REQUEST FOR JUDICIAL NOTICE [RJN]

**U.S. District Court
Eastern District of Virginia - (Richmond)
CIVIL DOCKET FOR CASE #: 3:17-cv-00601-MHL**

Steele et al v. Goodman et al
Assigned to: District Judge M. Hannah Lauck
Demand: \$15,500,000
Cause: 28:1332 Diversity-Personal Injury

Date Filed: 09/01/2017
Jury Demand: Plaintiff
Nature of Suit: 320 Assault Libel &
Slander
Jurisdiction: Diversity

Plaintiff

Robert David Steele

represented by **Steven Scott Biss**
300 West Main St
Ste 102
Charlottesville, VA 22903
804-501-8272 ☎
Fax: 202-318-4098 ☎
Email: stevenbiss@earthlink.net
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Plaintiff

Earth Intelligence Network

represented by **Steven Scott Biss**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Defendant


Jason Goodman

represented by **Jason Goodman**
252 7th Avenue
New York, NY 10001
(323) 744-7594 ☎
PRO SE

Defendant

Patricia A. Negron

represented by **Terry Catherine Frank**
Kaufman & Canoles PC (Richmond)
1021 E Cary St Suite 1400
Two James Center
PO Box 27828
Richmond, VA 23219
804-771-5745 ☎
Fax: 888-360-9092 ☎
Email: tcfrank@kaufcan.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Richard Johan Conrod , Jr.
 Kaufman & Canoles PC
 150 W Main St
 PO Box 3037
 Norfolk, VA 23510
 (757) 624-3000 
 Email: rjconrod@kaufcan.com
 ATTORNEY TO BE NOTICED

Interested Party

Mercia Francis

Interested Party

D. George Sweigert
 336 Bon Air Center #241
 Greenbrae, CA 94901

Defendant

Susan A. Lutzke
also known as
 "Queen Tut"

Defendant

Queen Tut
a woman believed to be known as Carla
A. Howell
 TERMINATED: 04/19/2018

Date Filed	#	Docket Text
09/01/2017	<u>1</u>	COMPLAINT against Jason Goodman, Patricia A. Negron, and Queen Tut (Filing fee: \$400, receipt number: 0422-5694148) filed by Robert David Steele and Earth Intelligence Network. (Attachments: # <u>1</u> Civil Cover Sheet) (jsmi,) (Entered: 09/05/2017)
09/08/2017	<u>2</u>	Financial Interest Disclosure Statement by Earth Intelligence Network, Robert David Steele. (Biss, Steven) Modified docket text on 9/8/2017 (sbea,). (Clerk replaced main document on 9/11/2017). NEF was regenerated. Modified docket text on 9/11/2017 (sbea,). (Entered: 09/08/2017)
09/08/2017	<u>3</u>	Proposed Summons re <u>1</u> Complaint (<i>Summons to Jason Goodman</i>) by Robert David Steele. (Biss, Steven) (Entered: 09/08/2017)
09/08/2017	<u>4</u>	Proposed Summons re <u>1</u> Complaint (<i>Summons to Patricia Negron</i>) by Robert David Steele. (Biss, Steven) (Entered: 09/08/2017)
09/08/2017	<u>5</u>	Proposed Summons re <u>1</u> Complaint (<i>Summons to "Queen Tut" aka Susan A. Lutzke</i>) by Robert David Steele. (Biss, Steven) (Entered: 09/08/2017)

09/08/2017		Notice of Correction re: <u>2</u> Corporate Disclosure Statement; Clerk notified filing attorney that the wrong docketing event was used. The Clerk's Office has corrected this error. Attorney was also notified that the Statement did not contain the correct signature block. Clerk has requested attorney to email the document so that it maybe replaced and the NEF regenerated upon receipt. (sbea,) (Entered: 09/08/2017)
09/08/2017	<u>6</u>	Summons Issued as to Jason Goodman, Patricia A. Negron, and Queen Tut. <i>NOTICE TO ATTORNEY: Please remove header prior to printing. Print out <u>two</u> Electronically issued summons and one copy of the attachments for each defendant to be served with the complaint.</i> (sbea,) (Entered: 09/08/2017)
09/08/2017	<u>7</u>	Proposed Summons re <u>1</u> Complaint (<i>Summons to "Queen Tut" aka Carla Howell</i>) by Robert David Steele. (Biss, Steven) (Entered: 09/08/2017)
09/11/2017	<u>8</u>	ORDER. On September 1, 2017, Plaintiffs filed the Complaint against Defendants. Plaintiff Earth Intelligence Network ("Earth Intelligence") has failed to file its Disclosure Statement required by Federal Rule of Civil Procedure 7.1 1 and Local Civil Rule 7.1 of the Rules of the United States District Court for the Eastern District of Virginia. 2 Accordingly, the Court ORDERS Earth Intelligence to file its Financial Disclosure within seven (7) days of entry of this Order. Signed by District Judge M. Hannah Lauck on 09/11/2017. (tjoh,) (Entered: 09/11/2017)
09/12/2017	<u>9</u>	Financial Interest Disclosure Statement (Local Rule 7.1) by Earth Intelligence Network. (Biss, Steven) (Entered: 09/12/2017)
09/12/2017	<u>10</u>	Summons Issued as to Queen Tut aka Carla Howell. <i>NOTICE TO ATTORNEY: Print out two electronically issued summons and one copy of the attachments for each defendant to be served with the complaint.</i> (jsmi,) (Entered: 09/12/2017)
09/21/2017	<u>11</u>	AFFIDAVIT re <u>6</u> Summons Issued, <u>1</u> Complaint (<i>Affidavit of Service of Process Upon Jason Goodman</i>) by Robert David Steele. (Biss, Steven) (Entered: 09/21/2017)
09/22/2017		Notice of Correction re <u>11</u> Affidavit. Filing attorney notified to return summons and proof of service to Clerk's Office for filing. (jsmi,) (Entered: 09/22/2017)
09/28/2017	<u>12</u>	SUMMONS Returned Executed. Jason Goodman served on 9/18/2017, answer due 10/10/2017. (Attachments: # <u>1</u> Letter) (jsmi,) (Entered: 09/28/2017)
10/05/2017	<u>13</u>	SUMMONS Returned Executed. Patricia A. Negron served on 9/26/2017, answer due 10/17/2017. (jsmi,) (Entered: 10/05/2017)
10/06/2017	<u>14</u>	ANSWER to <u>1</u> Complaint by Jason Goodman. (Attachments: # <u>1</u> Letter)(tjoh,) (Entered: 10/06/2017)
10/17/2017	<u>15</u>	MOTION for Extension of Time to File Answer re <u>1</u> Complaint <i>and related Responsive Pleadings</i> by Patricia A. Negron. (Attachments: # <u>1</u> Exhibit A-Exhibit A)(Frank, Terry) (Entered: 10/17/2017)
10/24/2017	<u>16</u>	ORDER that the Court GRANTS <u>15</u> Motion for Extension of Time to Answer. The Court ORDERS Negron to file her responsive pleadings to the Complaint

		no later than close of business November 8, 2017. Signed by District Judge M. Hannah Lauck on 10/24/2017. (jsmi,) (Entered: 10/24/2017)
11/02/2017	<u>17</u>	CERTIFICATE of Service <i>and Mailing</i> re <u>6</u> Summons Issued, <u>1</u> Complaint by Steven Scott Biss on behalf of All Plaintiffs (Attachments: # <u>1</u> Exhibit A)(Biss, Steven) (Entered: 11/02/2017)
11/02/2017	<u>18</u>	Summons Returned Unexecuted as to Queen Tut. (Attachments: # <u>1</u> Letter) (jsmi,) (Entered: 11/03/2017)
11/06/2017	<u>19</u>	SUMMONS Returned Executed. Queen Tut served on 10/25/2017, answer due 11/15/2017. (Attachments: # <u>1</u> Letter) (jsmi,) (Entered: 11/06/2017)
11/08/2017	<u>20</u>	NOTICE of Appearance by Richard Johan Conrod, Jr on behalf of Patricia A. Negron (Conrod, Richard) (Entered: 11/08/2017)
11/08/2017	<u>21</u>	MOTION to Dismiss by Patricia A. Negron. (Conrod, Richard) (Entered: 11/08/2017)
11/08/2017	<u>22</u>	Memorandum in Support re <u>21</u> MOTION to Dismiss filed by Patricia A. Negron. (Conrod, Richard) (Entered: 11/08/2017)
11/15/2017	<u>23</u>	Request for Hearing by Patricia A. Negron re <u>21</u> MOTION to Dismiss (Conrod, Richard) (Entered: 11/15/2017)
11/20/2017	<u>24</u>	Memorandum in Opposition re <u>21</u> MOTION to Dismiss filed by Robert David Steele. (Attachments: # <u>1</u> Exhibit A)(Biss, Steven) (Entered: 11/20/2017)
11/27/2017	<u>25</u>	MOTION for Extension of Time to File Response/Reply as to <u>24</u> Memorandum in Opposition by Patricia A. Negron. (Attachments: # <u>1</u> Exhibit A)(Frank, Terry) (Entered: 11/27/2017)
11/28/2017	<u>26</u>	ORDER that the Court GRANTS <u>25</u> Motion for Extension of Time. The Court ORDERS Negron to file her reply no later than close of business December 4, 2017. Signed by District Judge M. Hannah Lauck on 11/28/2017. (jsmi,) (Entered: 11/28/2017)
12/04/2017	<u>27</u>	MOTION for Extension of Time to File Response/Reply as to <u>24</u> Memorandum in Opposition by Patricia A. Negron. (Attachments: # <u>1</u> Exhibit A)(Frank, Terry) (Entered: 12/04/2017)
12/05/2017	<u>28</u>	ORDER that the Court GRANTS Defendant Patricia A. Negron's <u>27</u> Motion for Extension of Time. The Court ORDERS Negron to file her reply no later than close of business December 8, 2017. Signed by District Judge M. Hannah Lauck on 12/5/2017. (jsmi,) (Entered: 12/05/2017)
12/08/2017	<u>29</u>	REPLY to Response to Motion re <u>21</u> MOTION to Dismiss filed by Patricia A. Negron. (Frank, Terry) (Entered: 12/08/2017)
01/23/2018	<u>30</u>	Request for Entry of Default as to " <i>Queen Tut</i> " a/k/a <i>Susan A. Lutzke</i> by Earth Intelligence Network, Robert David Steele. (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Exhibit B)(Biss, Steven) (Entered: 01/23/2018)
02/21/2018	<u>31</u>	

		(Court only) Letter received from Mercia Francis. (jsmi,) (Additional attachment(s) added on 2/22/2018: # <u>1</u> Attachment) (jsmi,). (Entered: 02/22/2018)
02/23/2018	<u>32</u>	(Court only) Letter <i>Responding to Document 31</i> . (Biss, Steven) (Entered: 02/23/2018)
03/01/2018	<u>33</u>	(Court only) Letter received from Mercia Francis. (jsmi,) (Entered: 03/01/2018)
03/07/2018	<u>34</u>	(Court only) Response to <u>31</u> Letter, <u>33</u> Letter filed by Robert David Steele. (Biss, Steven) (Entered: 03/07/2018)
03/09/2018	<u>35</u>	ORDER that the Court DENIES WITHOUT PREJUDICE Plaintiff's <u>30</u> Motion for Entry of Default. The Court DIRECTS the Clerk to restrict the filings associated with docket numbers 31 and 33 as "Court Only". See Order for details. Signed by District Judge M. Hannah Lauck on 3/9/2018. (jsmi,) (Entered: 03/09/2018)
03/25/2018	<u>36</u>	MOTION to Amend/Correct <u>1</u> Complaint (<i>Motion For Leave To File Amended Complaint</i>) by Robert David Steele. (Attachments: # <u>1</u> Exhibit A)(Biss, Steven) (Entered: 03/25/2018)
03/25/2018	<u>37</u>	Memorandum in Support re <u>36</u> MOTION to Amend/Correct <u>1</u> Complaint (<i>Motion For Leave To File Amended Complaint</i>) filed by Robert David Steele. (Biss, Steven) (Entered: 03/25/2018)
04/11/2018	<u>38</u>	ORDER that the Court GRANTS <u>36</u> Motion to Amend. Plaintiffs SHALL file their Amended Complaint within 5 days of this Order. Plaintiffs have 90 days to serve any remaining defendants not yet served. To the extent necessary the Court DENIES AS MOOT Negron's <u>21</u> Motion to Dismiss. All responsive pleadings to the Amended Complaint SHALL be filed in accordance with the Federal and Local Rules of Civil Procedure. Signed by District Judge M. Hannah Lauck on 4/11/2018. Copy to Goodman as directed. (jsmi,) (Entered: 04/11/2018)
04/13/2018	<u>39</u>	AMENDED COMPLAINT against All Defendants, filed by Robert David Steele.(Biss, Steven) (Entered: 04/13/2018)
04/17/2018	<u>40</u>	Proposed Summons re <u>39</u> Amended Complaint (<i>Request for Issuance of Summons to Susan A. Lutzke</i>) by Robert David Steele. (Biss, Steven) (Entered: 04/17/2018)
04/19/2018	<u>41</u>	Summons Issued as to Susan A. Lutzke. NOTICE TO ATTORNEY: Print out two electronically issued summons and one copy of the attachments for each defendant to be served with the complaint. (jsmi,) (Entered: 04/19/2018)
04/26/2018	<u>42</u>	MOTION for Extension of Time to File Response/Reply as to <u>39</u> Amended Complaint by Patricia A. Negron. (Attachments: # <u>1</u> Exhibit A)(Frank, Terry) (Entered: 04/26/2018)
04/27/2018	<u>43</u>	ORDER that the Court GRANTS Defendant Patricia A. Negron's <u>42</u> Motion for Extension of Time. Negron SHALL FILE her response to Plaintiffs' Amended Complaint no later than close of business May 11, 2018. Signed by District Judge M. Hannah Lauck on 4/27/2018. (jsmi,) (Entered: 04/27/2018)

04/30/2018	<u>44</u>	ANSWER to Complaint by Jason Goodman. (smej,) (Entered: 05/01/2018)
04/30/2018	<u>45</u>	SPECIAL MOTION to Dismiss the Complaint Under the VA Anti-Slapp Statute by Jason Goodman. (smej,) (Entered: 05/01/2018)
04/30/2018	<u>46</u>	MOTION to Sever by Jason Goodman. (smej,) (Entered: 05/01/2018)
05/11/2018	<u>47</u>	MOTION to Dismiss for Failure to State a Claim by Patricia A. Negron. (Frank, Terry) (Entered: 05/11/2018)
05/11/2018	<u>48</u>	Memorandum in Support re <u>47</u> MOTION to Dismiss for Failure to State a Claim filed by Patricia A. Negron. (Frank, Terry) (Entered: 05/11/2018)
05/14/2018	<u>49</u>	Memorandum in Opposition re <u>45</u> MOTION to Dismiss filed by Robert David Steele. (Biss, Steven) (Entered: 05/14/2018)
05/14/2018	<u>50</u>	Memorandum in Opposition re <u>46</u> MOTION to Sever filed by Robert David Steele. (Biss, Steven) (Entered: 05/14/2018)
05/22/2018	<u>51</u>	Declaration of George Sweigert. (Attachments: # <u>1</u> Exhibits)(jsmi,) (Entered: 05/23/2018)
05/23/2018	<u>52</u>	Defendant's Reply to Memorandum Opposition to Special Motion to Dismiss filed by Jason Goodman. (jsmi,) (Entered: 05/24/2018)
05/25/2018	<u>53</u>	Memorandum in Opposition re <u>47</u> MOTION to Dismiss for Failure to State a Claim filed by Robert David Steele. (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Exhibit B) (Biss, Steven) (Entered: 05/25/2018)
05/25/2018	<u>54</u>	Second Declaration of D. George Sweigert. (jsmi,) (Entered: 05/25/2018)
05/29/2018	<u>55</u>	Third Declaration of D. George Sweigert. (jsmi,) (Entered: 05/30/2018)
05/30/2018	<u>56</u>	Fourth Declaration of D. George Sweigert. (jsmi,) (Entered: 05/30/2018)
05/31/2018	<u>57</u>	Reply to Motion re <u>47</u> MOTION to Dismiss for Failure to State a Claim filed by Patricia A. Negron. (Conrod, Richard) (Entered: 05/31/2018)
06/01/2018	<u>58</u>	Fifth Declaration of D. George Sweigert. (jsmi,) (Entered: 06/04/2018)
06/07/2018	<u>59</u>	Sixth Declaration of D. George Sweigert. (jsmi,) (Entered: 06/07/2018)
06/13/2018	<u>60</u>	Seventh Declaration of D. George Sweigert. (jsmi,) (Entered: 06/14/2018)

PACER Service Center			
Transaction Receipt			
07/02/2018 14:46:35			
PACER Login:	dgsweigert:5610803:0	Client Code:	
Description:	Docket Report	Search Criteria:	3:17-cv-00601-MHL
Billable Pages:	4	Cost:	0.40

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3 PUBLIC ARTIFACT NUMBER THREE: Document no. 60, 6/13/2018 posted in the court docket listed above
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PLAINTIFF'S FIRST REQUEST FOR JUDICIAL NOTICE [RJN]

1 D. GEORGE SWEIGERT, C/O
2 336 BON AIR CENTER #241
3 GREENBRAE, CA 94904

4 IN THE UNITED STATES DISTRICT COURT
5 FOR THE EASTERN DISTRICT OF VIRGINIA
6 RICHMOND DIVISION

7 ROBERT DAVID STEELE, ET. AL.

8 Plaintiff,

9 vs.

10 JASON GOODMAN, ET. AL.

11 Defendant

Case No.: 3:17-CV-601-MHL

DECLARATION OF D.
GEORGE SWEIGERT

12 SEVENTH DECLARATION OF D. GEORGE SWEIGERT

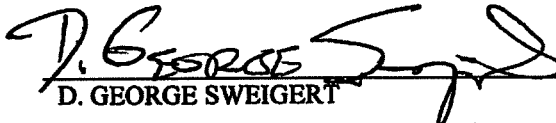
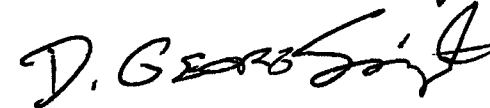
13 Now comes D. George Sweigert, a non-attorney layman and California licensed Emergency Medical Technician, to
14 affirm and attest to the below facts under penalties of perjury. The undersigned attests and affirms that all attached
15 exhibits are true and accurate copies of sources (such as Internet web sites).

16 Notice of potential related litigation

17 The undersigned is presently engaged in having the attached Exhibit (complaint) appropriately filed in the
18 U.S. District Court for the District of South Carolina.

19 The undersigned attests and affirms that all attached exhibits are true and accurate copies of sources.

20 Dated this day of June 11, 2018

21 
22 D. GEORGE SWEIGERT
23 
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DECLARATION OF D. GEORGE SWEIGERT - 1

LIST OF EXHIBITS

I. COMPLAINT

EXHIBIT ONE

DECLARATION OF D.GEORGE SWEIGERT - 3

1 D. GEORGE SWEIGERT, C/O
2 336 BON AIR CENTER #241
3 GREENBRAE, CA 94904

4 IN THE UNITED STATES DISTRICT COURT
5 FOR THE DISTRICT OF SOUTH CAROLINA

6 D. GEORGE SWEIGERT

7 Plaintiff,

8 vs.

9 JASON GOODMAN

10 Defendant

Case No.:

COMPLAINT PURSUANT TO FEDERAL
RACKETEER INFLUENCED AND CORRUPT
ORGANIZATIONS ACT

11 VERIFIED COMPLAINT

12 Now comes D. George Sweigert, a non-attorney layman and California licensed Emergency Medical Technician, to
13 provide an affirmation and to attest to the facts described below under penalties of perjury. The undersigned attests
14 and affirms that all attached exhibits are true and accurate copies of sources (such as Internet web sites or e-mail
15 messages). The pro se plaintiff herein alleges facts to initiate this claim pursuant to the federal Racketeer
16 Influenced and Corrupt Organizations (RICO) as a result of plaintiff's "reasonable inquiry" as required by Fed. R.
17 Civ. P. 11. The plaintiff alleges violations of 18 U.S.C. § 1962(a), (b), (c), and (d) by the defendant and wrong-
18 doers. Allegations include predicate offenses of wire fraud, the "circumstances constituting fraud or mistake shall
19 [have] be stated with particularity." Fed. R. Civ. P. 9(b). Victims include the United States Coast Guard, the Port
20 of Charleston, the City of Charleston, S.C. and the plaintiff (amongst others).

21 INTRODUCTION

22 **BACKGROUND**

23 This complaint alleges that the leaders of a Scientology-like cult, insisting they are called "journalists",
24 have relied on social media retaliation teams to humiliate, shame and deny economic opportunities to anyone that
25 disagrees with their versions of conspiracy theories, fake news, hoaxes sham reporting, passing off junk science as
26 research, or using a contract F.B.I. informant to operate a private fusion center, etc., etc.

27
28 COMPLAINT PURSUANT TO FEDERAL RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS
ACT - 1

1 As self-proclaimed profit-motivated “citizen journalists”, this cartel believes in “no-fault journalism” and
2 follows a familiar racketeering pattern to defraud the public, defraud their sponsors, defraud the federal government
3 and defraud those like the plaintiff that protest the actions of this cartel.

4 **Racketeering Pattern**

- 5 • “Journalist” claims to have specialized access to sensationalized information.
- 6 • Cartel claims the researcher/reporter is now in danger for their “research” efforts.
- 7 • The reporter/researcher is under attack by “deep state” affiliates (assassination attempts).
- 8 • These fearless researchers/reporters require monies, cash wire transfers, supporters, sponsors, etc.
9 to continue their “important research” (amounts of \$17K have been raised).
- 10 • An ever present on-going “no-fault journalism telethon” is underway on social media to raise
11 monies via unregistered corporations with non-legal tradenames to continue the above pattern.

12 ***PORT OF CHARLESTON “DIRTY BOMB HOAX”***

13 The Port of Charleston (herein Port), S.C. is classified as part of the nation’s “critical infrastructure and key
14 resources” (CIKR) (as defined by Homeland Security Presidential Directive 7, published 12/17/2003, entitled
15 “SUBJECT: Critical Infrastructure Identification, Prioritization, and Protection”).

16 A year ago, the defendant and his wrong-doers forced the closure of the Port’s Wando marine terminal
17 (under conditions of a radiological device threat) with one of their typical hysteria producing fake news YouTube
18 video reports spread via Twitter storms to official government social media accounts.

19 The Port incident (6/14/2017) is commonly referred to in social media circles as the “Port of Charleston
20 Dirty Bomb Hoax” (herein Port hoax). This embarrassment and mockery of the Port’s CIKR incident response
21 continues to be a permanent stain on the reputation of the U.S.C.G. and the Port.

22 This hoax (1) significantly impacted maritime interstate and foreign commerce of the Port (speaks to forum
23 jurisdiction), (2) defrauded the U.S.C.G. with a fraudulent threat emergency message, (3) violated the Computer
24 Fraud and Abuse Act (CFAA), (4) violated the Terrorist Hoax Improvements Act (THIA), (5) violated the RICO
25 Act, and to add insult to injury (6) revealed radiological incident response vulnerabilities of the Port’s CIKR (a soft
26 form of economic espionage as the Port is a known terrorist target). See National Infrastructure Protection Plan
27 (NIPP), U.S. Department of Homeland Security (DHS), 2009.

28 COMPLAINT PURSUANT TO FEDERAL RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS
ACT - 2

1 According to 6/14/2017 press reports the U.S.C.G. Charleston Sector duty officer received warnings about
2 a “dirty bomb” in the Port via telephone at approximately 8:00 pm. A “dirty bomb” is a term of used to describe an
3 improvised radiological device that is designed for the purposes of a terrorism. (U.S. Army Field Manual No. FM 3-
4 0, Chapter 9, 37 (14 June 2001)).

5 Media outlets that carried the story included the N.Y. Times, N.Y. Post, CNBC, ABC News 4, Time, etc.
6 As reported by Time, “The Coast Guard responded to the port’s Wando terminal after they received two
7 calls around 8 p.m. on Wednesday notifying them of a possible dirty bomb — an explosive containing
8 radioactive material — on the container ship Maersk Memphis, according to the New York *Times*.”
9 (<http://time.com/4820968/port-of-charleston-bomb-threat-conspiracy-theorist/>)

10 For a more complete analysis see the article entitled “False claims lead to real problems
11 Conspiracy theory shuts down port,” 6/20/2017, The Journal Gazette
12 (<http://www.journalgazette.net/news/local/frank-gray/20170620/false-claims-lead-to-real-problems>).

13 The evacuation of workers from the Wando marine terminal set in motion a series of cascading press
14 reports quoting “dirty bomb” that caused the widespread panic to the community of the City of Charleston and the
15 workers of the Port, analogues to a war scare.

16 **PARTIES**

17 This complaint alleges that the defendant and his wrongdoers, operating in alignment on social media with
18 a common purpose, created the deceptive Port hoax with the expectation of remuneration, increases in their financial
19 status and receipt of other such pecuniary advantages and benefits. Since the Port hoax, these individuals continue
20 to display a deceptive and coordinated pattern and practice of racketeering activity to obtain remuneration, monies,
21 rewards and other benefits.

22 During their course of conduct all defendant and wrong-doers relied upon the wires if the interstate Internet
23 to commit their offenses.

24 **PLAINTIFF – CERTIFIED IN INFRASTRUCTURE PROTECTION**

25 The plaintiff [undersigned] has been trained in the field of critical infrastructure protection (CIP) as defined
26 by Executive Order 13636, 2/12/2013, “Improving Critical Infrastructure Cybersecurity”. In this regard the plaintiff
27 has been certified as a (1) California State certified Emergency Management Specialist, (2) Certified Homeland

28 **COMPLAINT PURSUANT TO FEDERAL RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS
ACT - 3**

1 Protection Associate III (Homeland Protection Professional Certification Board), (3) Certified in Homeland Security
2 – III (American Board for Certification in Homeland Security), etc.

3 When the plaintiff became critical of the actions of Goodman and Webb [Sweigert] in the plaintiff's white
4 paper [Exh. 1] he became targeted by the CSTT enterprise have the plaintiff's opinion, comments and/or critiques of
5 CSTT completely nullified by a reputation destruction campaign.

6 A more exhaustive introduction of the plaintiff is provided in the damages section of this complaint.

7 **MULTIMEDIA SYSTEM DESIGN, INC.**

8 As the Court will learn, the Port hoax was largely an alleged publicity stunt to increase the
9 financial value of a corporation known as "MULTIMEDIA SYSTEM DESIGN, INC." (MSDI), a New
10 York State corporation since 1994. MSDI serves as the "headquarters" of an extended social media
11 confederation (racketeering enterprise) consisting of several independent and individually distinguishable
12 entities that apparently operate in alignment with MSDI via MSDI's non-registered tradename "Crowd
13 Source The Truth" (CSTT)". (Trademark application pending).

14 **CROWDSOURCE THE TRUTH – RACKETEERING ENTERPRISE**

15 "Crowd Source The Truth" serves as a legal short-hand to embody the common plan which
16 describes the social media based racketeering enterprise that is comprised of several YouTube
17 personalities operating towards common goals and objectives that violate several statutes regarding wire
18 fraud, tampering with witnesses and apparent "DarkNet" murder for hire activities.

19 ***CSTT TRADEMARKS AND OWNER/OPERATORS***

20 CSTT represents a separate and distinct legal fiction separate and apparent from the culpable
21 individuals and the MSDI corporation described herein.

22 On trademark registration application (filed 1/10/2018) for the mark "Crowdsorce The Truth"
23 (CSTT), the applicant MSDI, via Jason Goodman, provided the address "6s 252 7th Avenue New York NEW
24 YORK 10001" to the U.S. Patent and Trademark Office (USPTO). (USPTO serial number 87752970).

25 The following entry is made in a federal court pleading in the signature block: "Jason Goodman, 252 7th
26 Avenue #6S. New York, N.Y. Telephone (323) 744-7594, Facsimilia (917) 591-6370, Email:
27 truth@crowdsourcethetruth.org, Pro Se." (page 7 of 8 in the document "DEFENDANT JASON GOODMAN'S

28 COMPLAINT PURSUANT TO FEDERAL RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS
ACT - 4

D. GEORGE SWEIGERT, C/O
336 BON AIR CENTER #241
GREENBRAE, CA 94904

**IN THE UNITED STATES DISTRICT COURT
 FOR THE EASTERN DISTRICT OF VIRGINIA
 RICHMOND DIVISION**

ROBERT DAVID STEELE, ET. AL.

Plaintiff,

vs.

JASON GOODMAN, ET. AL.

Defendant

Case No.: 3:17-CV-601-MHL

CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE

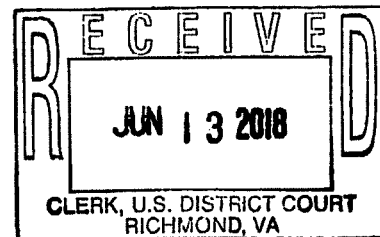
On this day, June 11, 2018, I have caused to be placed into the U.S. Postal Service true copies of the attached pleading (with First Class postage affixed) to the following parties.

**Fernando Galindo, Clerk
 U.S. District Court, E.D. VA
 Federal Courthouse
 701 East Broad Street
 Richmond, VA 23219**

**Steven S. Biss (VSB # 32972)
 300 West Main Street, Suite 102
 Charlottesville, Virginia 22903**

**Terry Catherine Frank
 Kaufman & Canoles PC
 1021 E. Cary Street, Suite 1400
 PO Box 27828
 Richmond, VA 23219**

**Jason Goodman
 252 7th Avenue #6S
 New York, NY 10001**



I hereby attest under the penalties of perjury that the foregoing is true and accurate.

D. GEORGE SWEIGERT
D. GEORGE SWEIGERT